



BellSouth Telecommunications, Inc.
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August 20, 2001

Guy M. Hicks
General Counsel

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VIA HAND DELIVERY

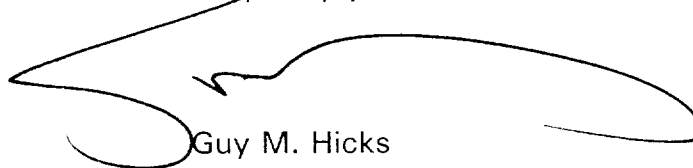
David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Docket to Establish Generic Performance Measurements, Benchmarks
and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

Dear Mr. Waddell:

Enclosed are five paper copies and a CD Rom containing BellSouth's responses in connection with the Hearing Officer's August 16, 2001 Notice of Filing. Paper copies of the enclosed are being provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH:ch
Enclosure

CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2001, a copy of the foregoing document was served on the following parties, via the method indicated:

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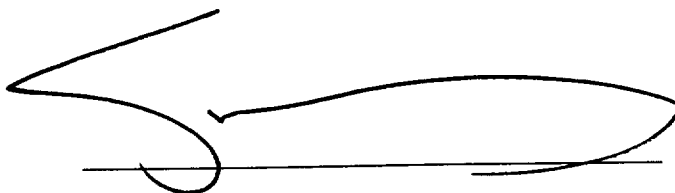
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Dana Shaffer, Esquire
XO Communications, Inc.
105 Malloy Street
Nashville, TN 37201

A handwritten signature in black ink, consisting of a large, stylized 'S' or 'J' shape, followed by a horizontal line.

BELLSOUTH TELECOMMUNICATIONS, INC.
August 20, 2001

Matrix 1

SQM Measures from the TRA Order of August 11, 2000, and later modified by the June 26, 2001 order in Docket 99-00430	Agree or Disagree with Baseline Measure ^{/1 /2}	If disagree, Proposed alternative.
Pre-Ordering OSS		
1. Average Response Time and Response Interval	AGREE	
2. Interface Availability Regional Level 99.5% for any unscheduled downtime. No	AGREE	
Ordering		
3. Percent Flow-Through Service Requests (Summary)	AGREE	
4. Percent Flow-Through Service Requests (Detail)	AGREE	
5. Flow-Through Error Analysis	AGREE	But not a measurement
CLEC LSR Information - LSR Flow-Through Matrix		
6. Percent Rejected Service Requests	AGREE	
7. Reject Interval Distribution and Average Reject Interval	DISAGREE	Replace with "Reject Interval"
8. Reject Interval	AGREE	
9. Percent Firm Order Confirmation Returned	AGREE	But same as BellSo O-9
10. Speed of Answer in Ordering Center	AGREE	
11. Average Response Time for Loop Make-Up Information	AGREE	
Provisioning		
12. Mean Held Order Interval & Distribution Intervals	AGREE	
13. Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices	AGREE	
14. Percent Missed Installation Appointments	AGREE	
15. Average Completion Interval (OCI) & Order Completion Interval Distribution	AGREE	
16. Average Completion Notice Interval	AGREE	
17. Coordinated Customer Conversions	AGREE	
18. % Provisioning Troubles w/i 30 days Service Order Activity	AGREE	
19. Total Service Order Cycle Time (TSOCT)	AGREE	
20. Percentage of LNP Only Due Dates within Industry Guidelines	DISAGREE	Replace with P-11 LNP- Percent Missed Installation Appointments. (See Coon Direct, p.47 l.14 to p. 48
21. Percentage of Time the Old Service provider Releases the Subscription Prior to the Expiration of the Second 9 Hour Timer	DISAGREE	Replace with P-10A, LNP – Average Time of Out of Service for LNP Conversions and P-10B, LNP – Percentage of Time BellSouth Applies the 10-digit Trigger Prior to the LNP Order Due Date. (See Coon Direct, p.48, l.17 to p.49)

SQM Measures from the TRA Order of August 11, 2000, and later modified by the June 26, 2001 order in Docket 99-00430	Agree or Disagree with Baseline Measure ^{1/2}	If disagree, Proposed alternative.
22. Percentage of Customer Accounts Restructured Prior to LNP Due Date	DISAGREE	Replace with P-10A, LNP – Average Time of Out of Service for LNP Conversions. (See Coon Direct, p.48 l.18 to p.49)
23. Percentage of Pre -mature Disconnects for LNP Orders	DISAGREE	Replace with P-10A, LNP – Average Time of Out of Service for LNP Conversions and P-10B, LNP – Percentage of Time BellSouth Applies the 10-digit Trigger Prior to the LNP Order Due Date. (See Coon Direct, p.49 l.7-14.)
24. Average Days Required to Process a Request	DISAGREE	Unnecessary (See Coon Direct, p.49, l.16 to p.50)
25. Percentage of Pre -mature Disconnects (Coordinated Cutovers)	DISAGREE	This Measure was replaced with BellSouth's 2000 SQM "Coordinated Customer Conversions" in ITC^DeltaCom Arbitration. ³
26. Percentage of Missed Mechanized INP Conversions	DISAGREE	Replace with P-11, LNP-Percent Missed Installation Appointments. (See Coon Direct, p.51, l.11-23)
27. Percent NXX's loaded and tested prior to the LERG effective date	AGREE	
28. Average Delay Days for NXX Loading and Testing	DISAGREE	Replace with D-3, Percent NXXs and LRNs Loaded by the LERG Effective Date. (See Coon Direct, p.51, l.25 to p.52)
Maintenance & Repair		
29. Missed Repair Appointments	AGREE	
30. Customer Trouble Report Rate	AGREE	
31. Maintenance Average Duration	AGREE	
32. Percent Repeat Troubles w/i 30 days)	AGREE	
33. Out of Service > 24 Hours	AGREE	
34. OSS Interface Availability	AGREE	
35. OSS Response Interval and Percentages	AGREE	

³ SEE Tennessee Regulatory Authority, In RE: Petition For Arbitration of ITC^DeltaCom Communications, Inc. With BellSouth Telecommunications, Inc. Pursuant To The Telecommunications Act of 1996, Order On Reconsideration And Denying Joint Motion, Docket No. 99-00430, June 26, 2001, p. 7.

SQM Measures from the TRA Order of August 11, 2000, and later modified by the June 26, 2001 order in Docket 99-00430	Agree or Disagree with Baseline Measure ^{1/2}	If disagree, Proposed alternative.
36. Average Answer Time - Repair Centers	AGREE	
37. Mean Time to Repair	AGREE	Unnecessary. (See Coon Direct, p.52, 1.14-23)
Billing		
38. Invoice Accuracy	AGREE	
39. Mean Time to Deliver Invoices	AGREE	
40. Usage Data Delivery Accuracy	AGREE	
41. Usage Data Delivery Completeness	AGREE	
42. Usage Data Delivery Timeliness	AGREE	
43. Mean Time to Deliver Usage	AGREE	
44. Percent of Accurate and Complete Formatted Mechanized Bills	DISAGREE	Unnecessary (See Coon Direct, p.44, 1.23-p.45)
45. Billing Completeness	DISAGREE	Replace with B-7, Recurring Charge Completeness and B-8, Non-Recurring Charge Completeness. (See Coon Direct, p.45, 1.23 – p.46.)
46. Unbillable Usage	DISAGREE	Unnecessary (See Coon Direct, p.46, 1.13-p.47)
Operator Services (Toll) and Directory Assistance		
47. Average Speed to Answer (Toll)	AGREE	
48. Percent Answered within “X” Seconds (Toll)	AGREE	
49. Average Speed to Answer (DA)	AGREE	
50. Percent Answered within “X” Seconds (DA)	AGREE	
51. Percentage of Updates Completed into the DA Database within 72 hours for Facility Based CLECs	DISAGREE	Replace with D-1, Average Database Update Interval. (See Coon Direct, p.50, 1.8-20)
52. Average Update Interval for DA Database for Facility Based CLECs	AGREE	Equivalent to SQM, D-1, Average Database Update Interval.
53. Percentage DA Database Accuracy for Manual Updates	DISAGREE	Replace with D-1, Average Database Update Interval. (See Coon Direct, p.50, 1.22-p.51)
E911		
54. Timeliness	AGREE	
55. Accuracy	AGREE	
56. Mean Interval	AGREE	
Trunk Group Performance		
57. Trunk Group Service Report	AGREE	
58. Trunk Group Service Detail	AGREE	
Collocation		
59. Average Response Time	AGREE	

SQM Measures from the TRA Order of August 11, 2000, and later modified by the June 26, 2001 order in Docket 99-00430	Agree or Disagree with Baseline Measure ^{/1 /2}	If disagree, Proposed alternative.
60. Average Arrangement Time	AGREE	
61. % of Due Dates Missed	AGREE	
Bona Fide Requests	AGREE	
62. Percentage of Requests Processed within 30 Business Days	DISAGREE	Unnecessary (See Coon Direct, p.53, l.1 – p.54)
63. Percentage of Quotes Provided for Authorized BFRs / Special Requests Processed within X (10, 30, 90) Business Days	DISAGREE	Unnecessary (See Coon Direct, p.53, l.1 – p.54)
Attach additional proposed measures on a separate sheet.		

/1 Baseline measures for this proceeding are those adopted by the Authority in Docket 99-00430, the BellSouth/ ITC Deltacom Arbitration.

/2 Where BellSouth indicates that it agrees with the measure, this means it agrees that the measure itself is properly included in the plan. In the intervening two years, however, there have been changes in the business rules, etc. that are reflected in the new SQM.

Measurement Category	Additional Proposed Measures
Ordering	1. Acknowledgement Message Timeliness
	2. Acknowledgement Message Completeness
	3. Service Inquiry with LSR Firm Order Confirmation
	4. Firm Order Confirmation and Reject Response Completeness
Provisioning	5. Coordinated Customer Conversions – Hot Cut Timeliness % Within Interval and Average Interval
	6. Coordinated Customer Conversions – Average Recovery Time
	7. Hot Cut Conversions - % Provisioning Troubles Received Within 7 Days of a Completed Service Order
	8. Cooperative Acceptance Testing - % of DSL Loops Tested
	9. LNP – Average Time of Out of Service for LNP Conversions
	10. LNP – Percentage of Time BellSouth Applies the 10-digit Trigger Prior to the LNP Order Due Date
Maintenance & Repair	11. Mean Time to Notify CLEC of Network Outages
Billing	12. Recurring Charge Completeness
	13. Non-Recurring Charge Completeness
Database Update Information	14. Average Database Update interval
	15. Percent Database Update Accuracy
Change Management	16. Timeliness of Change Management Notices
	17. Change Management Notice Average Delay Days
	18. Timeliness of Documents Associated with Change
	19. Change Management Documentation Average Delay Days
	20. Notification of CLEC Interface Outages

BELLSOUTH TELECOMMUNICATIONS, INC.

August 20, 2001

Matrix II

Measures	Standards and Benchmarks	Agree or Disagree with Baseline Standard or Benchmark	If disagree, proposed alternative
Pre-Ordering OSS			
1. Average Response Time and Response Interval	Elapsed time is measured in seconds and tenths of seconds rounded to the nearest tenth of a second. Standard: TN Reservations 1-30: 2 seconds and none greater than 5 seconds. TN Reservations 31+: Less than 2 hours. Address validation, due date, LIDB: 2 seconds. CSR: 5 seconds. Dispatch: 8 seconds. PIC and Directory Listings: Parity.	DISAGREE	Parity + 4 seconds
2. Interface Availability Regional Level	Benchmark: 99.5% for any unscheduled downtime. No scheduled downtime during prime time operating hours (7am - 6pm Eastern).	AGREE	
Ordering			
3. Percent Flow-Through Service Requests (Summary)	Resale Residence - 95%; Resale Business - 90%; UNE - 85%; LNP - 85%.	AGREE	
4. Percent Flow-Through Service Requests (Detail)	Resale Residence - 95%; Resale Business - 90%; UNE - 85%; LNP - 85%.	AGREE	
5. Flow-Through Error Analysis	Diagnostic.	AGREE	
CLEC LSR Information - LSR Flow-Through Matrix			
6. Percent Rejected Service Requests	Diagnostic.	AGREE	
7. Reject Interval Distribution and Average Reject Interval	Texas Measurement	DISAGREE	SEE SQM - Reject Interval below

Measures	Standards and Benchmarks	Agree or Disagree with Baseline Standard or Benchmark	If disagree, proposed alternative
8. Reject Interval	95% or greater within: (mechanized) 1 hour; (partially mechanized) 5 hours; (non-mechanized) 24 hours.	Mechanized (AGREE); Partially Mechanized (DISAGREE); Non-Mechanized (DISAGREE)	85% or greater within: (Partially Mechanized) 10 hours; (Non-mechanized) 24 hours
9. Percent Firm Order Confirmation Returned	All Res and Bus 95% within 5 hours/ Complex Bus 94% within 24 hours for 200 or less lines and 48 hours for 200 or more lines/ UNE Loop (1-49) 95% within 5 hours/ UNE Loop (>50) 94% within 48 hours/ Switch Ports 95% within 5 hours. The Average for the remainder of each measure disaggregated shall not exceed 20% of the established benchmark.	DISAGREE	95% within 3 hours (mechanized); 85% within 10 hours (partially mechanized); 85% within 36 hours (non-mechanized)
10. Speed of Answer in Ordering Center	Greater than 95% of calls, by center, are answered within 20 seconds. 100% of all calls answered within 30 seconds.	DISAGREE	Diagnostic
11. Average Response Time for Loop Make-Up Information	Manual: 3 business days; Electronic (Actual Requested, actual received) 12.6 seconds and 90% - 15 seconds; 95% - 25 seconds. (Design requested, design received) 10 seconds and 90% - 11.9 seconds; 95% - 20 seconds.	Manual – AGREE Electronic – DISAGREE	Manual – 95% within 3 business days Electronic – 90% within 5 minutes
Provisioning			
12. Mean Held Order Interval & Distribution Intervals	See Appendix 1.	DISAGREE	See Appendix 1, Table 1
13. Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notices	95% >= 48 hours.	AGREE	Subject to disaggregation in Appendix 1, Table 1
14. Percent Missed Installation Appointments	See Appendix 1.	DISAGREE	See Appendix 1, Table 1

Measures	Standards and Benchmarks	Agree or Disagree with Baseline Standard or Benchmark	If disagree, proposed alternative
15. Average Completion Interval (OCI) & Order Completion Interval Distribution	95% within 'x' days unless otherwise noted - See Appendix 2.	DISAGREE	See Appendix 2, Table 1
16. Average Completion Notice Interval	See Appendix 1.	DISAGREE	See Appendix 1, Table 1
17. Coordinated Customer Conversions	95% <= 15 minutes	AGREE	
18. % Provisioning Troubles w/i 30 days Service Order Activity	See Appendix 1.	DISAGREE	See Appendix 1, Table 1
19. Total Service Order Cycle Time (TSOCT)	Diagnostic.	AGREE	
20. Percentage of LNP Only Due Dates within Industry Guidelines	96.5%	DISAGREE w/ need for measurement	See Coon Direct p.47, l.14 to p.48)
21. Percentage of Time the Old Service provider Releases the Subscription Prior to the Expiration of the Second 9 Hour Timer	96.5%	DISAGREE w/ need for measurement	See Coon Direct p.48, l.17 to p.49
22. Percentage of Customer Accounts Restructured Prior to LNP Due Date	96.5%	DISAGREE w/ need for measurement	See Coon Direct p.48, l.18 to p.49)
23. Percentage of Pre -mature Disconnects for LNP Orders	2% or less premature disconnects starting 10 minutes before scheduled due time.	DISAGREE w/ need for measurement	See Coon Direct p.49, l.7 – 14)
24. Average Days Required to Process a Request	90% within 35 days.	DISAGREE w/ need for measurement	See Coon Direct p.49, l.16 to p.50)
25. Percentage of Pre -mature Disconnects (Coordinated Cutovers)	Texas Measurement	DISAGREE	Measure was Eliminated in TRA's June 26, 2001 Order. ⁴

⁴ SEE Tennessee Regulatory Authority, In RE: Petition For Arbitration of ITC^DeltaCom Communications, Inc. With BellSouth Telecommunications, Inc. Pursuant To The Telecommunications Act of 1996, Order On Reconsideration And Denying Joint Motion, Docket No. 99-00430, June 26, 2001, p. 7.

Measures	Standards and Benchmarks	Agree or Disagree with Baseline Standard or Benchmark	If disagree, proposed alternative
26. Percentage of Missed Mechanized INP Conversions	2% or less premature disconnects starting 10 minutes before scheduled time, 8% or less of the BST coordinated conversions beyond 30 minutes, 2% beyond 1 hour from scheduled time or 1% beyond 2 hours.	DISAGREE w/ need for measurement	(See Coon Direct, p.51, l.11-23)
27. Percent NXX's loaded and tested prior to the LERG effective date	100% by LERG effective date.	AGREE	
28. Average Delay Days for NXX Loading and Testing	100% within 5 calendar days of completion date.	DISAGREE w/ need for measurement	(See Coon Direct, p.51, l. 25 to p.52)
Maintenance & Repair			
29. Missed Repair Appointments	Standard: 1% missed.	DISAGREE	Parity With Retail
30. Customer Trouble Report Rate	See Appendix 3.	DISAGREE	See Appendix 3, Table 1
31. Maintenance Average Duration	See Appendix 3.	DISAGREE	See Appendix 3, Table 1
32. Percent Repeat Troubles w/i 30 days	See Appendix 3.	DISAGREE	See Appendix 3, Table 1
33. Out of Service > 24 Hours	(1) Out of service conditions where a dispatch is required: 90% resolved within 4 hours, 95% resolved within 8 hours, 99% resolved within 16 hours. (2) Out of service conditions where no dispatch is required: 85% resolved within 2 hours, 95% resolved within 3 hours, 99% resolved within 4 hours. (3) All other troubles resolved within 24 hours.	DISAGREE	Parity with Retail
34. OSS Interface Availability	99.50%	AGREE	
35. OSS Response Interval and Percentages	Parity with retail (TAFI, CRIS, DLETH, DLR, LMOS, LMOSupd, LNP, MARCH, OSPCM, Predictor, SOCs).	AGREE	
36. Average Answer Time - Repair Centers	Greater than 95% of calls, by center, are answered within 20 seconds. 100% of all calls answered within 30 seconds.	DISAGREE	Parity with Retail

Measures	Standards and Benchmarks	Agree or Disagree with Baseline Standard or Benchmark	If disagree, proposed alternative
37. Mean Time to Repair	Parity with retail.	DISAGREE w/ need for measurement	See Coon Direct, p.52, l.14-23
Billing			
38. Invoice Accuracy	Parity with retail.	AGREE	
39. Mean Time to Deliver Invoices	Parity with retail.	AGREE	
40. Usage Data Delivery Accuracy	Parity with retail.	AGREE	
41. Usage Data Delivery Completeness	Parity with retail.	DISAGREE	98% or Greater
42. Usage Data Delivery Timeliness	Parity with retail.	DISAGREE	95% or Greater
43. Mean Time to Deliver Usage	Parity with retail.	DISAGREE	5 Days or Less
44. Percent of Accurate and Complete Formatted Mechanized Bills	99%		
45. Billing Completeness	Parity with retail.	DISAGREE	(See Coon Direct, p.47, l. 13 – 25.)
46. Unbillable Usage	Aggregate measurement. No Benchmark required.	DISAGREE	(See Coon Direct, p.48, l. 3 – p. 49, l. 2.)
Operator Services (Toll) and Directory Assistance			
47. Average Speed to Answer (Toll)	Parity by design.	AGREE	
48. Percent Answered within “X” Seconds (Toll)	Parity by design.	AGREE	
49. Average Speed to Answer (DA)	85% answered within 10 seconds. 95% answered within 20 seconds.	DISAGREE	Parity by Design
50. Percent Answered within “X” Seconds (DA)	85% answered within 10 seconds. 95% answered within 20 seconds.	DISAGREE	Parity by Design
51. Percentage of Updates Completed into the DA Database within 72 hours for Facility Based CLECs	95% updated within 72 hours.	DISAGREE w/ need for measurement	See Coon Direct, p.50, l.8-20)

Measures	Standards and Benchmarks	Agree or Disagree with Baseline Standard or Benchmark	If disagree, proposed alternative
52. Average Update Interval for DA Database for Facility Based CLECs	48 hours. Benchmark will be reevaluated in 6 months.	DISAGREE	A more comprehensive measure, D-1: Average Database Update Interval, is parity by design.
53. Percentage DA Database Accuracy for Manual Updates	97%	DISAGREE w/ need for measurement	(See Coon Direct, p.50, l.22 to p.51)
E911			
54. Timeliness	Parity by design.	AGREE	
55. Accuracy	Parity by design.	AGREE	
56. Mean Interval	Parity by design.	AGREE	
Trunk Group Performance			
57. Trunk Group Service Report	BST to CLEC trunk blockage at parity with BST to BST trunk blockage.	DISAGREE	Penalties apply for any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1, 3, 4, 5, 10, 16 for CLECs and 1, 9, 10, 16 for BellSouth
58. Trunk Group Service Detail	BST to CLEC trunk blockage at parity with BST to BST trunk blockage.	DISAGREE	Penalties apply for any 2 hour period in 24 hours where CLEC blockage exceeds BellSouth blockage by more than 0.5% using trunk groups 1, 3, 4, 5, 10, 16 for CLECs and 1, 9, 10, 16 for BellSouth
Collocation			
59. Average Response Time	95% within 10 calendar days.	DISAGREE	Virtual-20 Calendar Days; Physical Caged- 23 Business

Measures	Standards and Benchmarks	Agree or Disagree with Baseline Standard or Benchmark	If disagree, proposed alternative
			Days; Physical Cageless-23 Business Days; Augments for Line Sharing or Line Splitting-23 Business Days
60. Average Arrangement Time	Standard: (1) 90 calendar days Caged Physical Collocation, (2) 20 days Cageless Collocation, and (3) 30 calendar days Virtual Collocation.	DISAGREE	Virtual -50 Calendar Days (Ordinary); Virtual- 75 Calendar Days (Extraordinary); Physical Caged- 76 Business Days (Ordinary); Physical Caged-91 Business Days (extraordinary); Physical Cageless-76 Calendar Days (Ordinary); Physical Cageless- 91 Days (Extraordinary); Augments for Line Sharing or Line Splitting – 45 Business Days
61. % of Due Dates Missed	Zero misses of committed due date.	DISAGREE	= 95% On Time
Bona Fide Requests			
62. Percentage of Requests Processed within 30 Business Days	90% within 30 business days.	DISAGREE w/ need for measurement	(See Coon Direct, p.53, l.1 to p.54.)
63. Percentage of Quotes Provided for Authorized BFRs / Special Requests Processed within X (10, 30, 90) Business Days	90% within 30 business days. New network elements that are operational at the time of request - 10 days. New network elements that are Ordered by the FCC - 30 days. New network elements not operational at the time of the request - 90 days.	DISAGREE w/ need for measurement	(See Coon Direct, p.53, l.1 to p.54)

Appendix 1

Mean Held Order Interval
Percent Missed Installation Appointments
Average Completion Notice Interval
Percent Provisioning Troubles w/130 days

Benchmark/Analog

Resale residence	Parity with retail residence
Resale Business	Parity with retail business
Resale Design	Parity with retail Design
Resale PBX	Parity with retail PBX
Resale Centrex	Parity with retail Centrex
Resale ISDN	Parity with retail ISDN
2 W Analog Loop Design	Retail Res. And Bus. Dispatch
2 W Analog Loop Non-Design	Retail Res. And Bus. POTS
Dispatch2 W Analog Loop w/INP Design	Retail Res. And Bus. Dispatch
2 W Analog Loop w/INP Non-Design	Retail Res. And Bus. Dispatch
2 W Analog Loop w/LNP Design	Retail Res. And Bus Dispatch
2 W Analog Loop w/LNP Non-Design	Retail Res. And Bus Dispatch
UNE Digital Loop <DSI	Retail Digital Loop<DSI
UNE Digital Loop>=DSI	Retail Digital Loop>=DSI
UNE x DSL (ADSL, HDSL, UCL)	ADSL provide to retail
UNE ISDN	Retail ISDN-BRI
Line Sharing	ADSL provide to retail
INP Standalone	Retail POTS
LNP Standalone	Retail POTS
Switch ports	Retail POTS
Loop + port combination	Retail Res. And Bus. (POTS)
UNE Combo Other	Retail Res., Bus, & Design (Dispatch)
Local Transport	Retail DSI/DS3 Interoffice
UNE Other Non-Design	Retail Res. & Bus.
UNE Other Design	Retail Design
Local Interconnection Trunks	Parity with retail

Appendix 1 Table 1: BellSouth's Proposed Alternative for:

Mean Held Order Interval

Percent Missed Installation Appointments

Average Completion Notice Interval

Percent Provisioning Troubles w/130 days

Disaggregation	Analog / Benchmark
Resale Residence	Retail Residence
Resale Business	Retail Business
Resale Design	Retail Design
Resale PBX	Retail PBX
Resale Centrex	Retail Centrex
Resale ISDN	Resale ISDN
LNP	Retail Res.and Bus. (POTS)
2W Analog Loop Design	Retail Res and Bus. Dispatch
2W Analog Loop Non-Design	Retail Res and Bus.- POTS (Excl.. Switch-based Orders)
UNE Digital Loop < DS1	Retail Digital Service < DS1
UNE Digital Loop = DS1	Retail Digital Service = DS1
UNE Loop + Port Combinations	Retail Res and Bus. (POTS)
UNE Switch Ports	Retail Res and Bus. (POTS)
UNE Other Design	Retail Design
UNE Other Non-Design	Retail Res. And Bus. (POTS)
UNE Combo Other	Retail Res., Bus. And Design Dispatch
UNE xDSL (HDSL, ADSL and UCL)	ADSL Provided to Retail
UNE ISDN (Includes UDC)	Retail ISDN – BRI
UNE Line Sharing	ADSL Provided to Retail
Local Transport (Unbundled Interoffice Transport)	Retail DS1/DS3 Interoffice
Local Interconnection Trunks	Parity with Retail

Appendix 2

Disaggregation, Analogs and Benchmarks		
G. Product Level Disaggregation for (Ordering, Provisioning, and Maintenance & Repair)	Benchmark-- 95% within x Days unless otherwise noted (resale) for <u>Order Completion Interval</u>	Retail analog for other provisioning and maintenance and repair measures
1. Resold Residence POTS 2. Resold Business POTS 3. Resold BRI ISDN 4. Resold PRI ISDN 5. Resold Centrex/Centrex-like 6. Resold Analog PBX trunks 7. Resold DID Trunks 8. Resold Voice-Grade Private Line 9. Resold DS1 Services 10. Resold DS3 Services 11. Resold >DS3 Services 12. Other Resold Services 13. UNE Platform 14. UNE Channelized DS1 (DS1 loop + multiplexing) 15. Unbundled 8 dB Analog Loops 16. Unbundled 2-wire Digital Loops 17. Unbundled 4-wire Digital Loops 18. Unbundled ADSL Loops 19. Unbundled HDSL Loops 20. Unbundled xDSL Loops 21. Other Unbundled Loops 22. UNE Analog Switch Port (line side) 23. UNE BRI Capable Switch Port (line	1. Retail Analog 2. Retail Analog 3. Retail Analog 4. Retail Analog 5. Retail Analog 6. Retail Analog 7. Retail Analog 8. Retail Analog 9. Retail Analog 10. Retail Analog 11. Retail Analog 12. Retail Analog 13. Retail POTS 14. 3, 7, and 10 days, for a ,b, and c, volumes respectively 15. Same as above 16. Same as above 17. Same as above 18. Same as above 19. Same as above 20. Same as above 21. Same as above 22. 2 days 23. 3 days	1. Retail Analog 2. Retail Analog 3. Retail Analog 4. Retail Analog 5. Retail Analog 6. Retail Analog 7. Retail Analog 8. Retail Analog 9. Retail Analog 10. Retail Analog 11. Retail Analog 12. Retail Analog 13. Retail POTS 14. DS1 15. Retail POTS 16. Retail POTS 17. Retail POTS 18. DS1 19. DS1 20. DS1 21. DS1 22. POTS 23. ISDN

Disaggregation, Analogs and Benchmarks		
G. Product Level Disaggregation for (Ordering, Provisioning, and Maintenance & Repair)	Benchmark-- 95% within x Days unless otherwise noted (resale) for <u>Order Completion Interval</u>	Retail analog for other provisioning and maintenance and repair measures
side) 24. UNE DS1 Switch Port (line side) 25. UNE PRI Switch Port (trunk side) 26. UNE DID-capable Switch Port (trunk side) 27. UNE Message Trunk Port 28. UNE Dedicated DS0 Transport 29. UNE Dedicated DS1 Transport 30. UNE Dedicated DS3 Transport 31. Interconnect Trunks (DS0s, DS1s and DS3s,) 32. Two-Way Trunking, Inbound Augments, separately) 33. ILNP 34. PNP or LNP 35. Line-sharing/High Frequency Spectrum UNE 36. Sub-loop unbundling, e.g. network terminating wire 37. Loop Modification/Loop Conditioning	24. 5 days 25. 5 days 26. 5 days 27. 5 days 28. 3, 7, and 10 days, for a, b, and c, volumes respectively 29. Same as above 30. Same as above 31. ILEC Trunks 32. ILEC Trunks 33. 3, 7, and 10 days, for a, b, and c, volumes respectively 34. Same as above 35. 3, 5 and 7 days for a, b and c, volumes 36. 5, 7, 10 days for a, b, and c, volumes 37. 5, 7, 10 days for a, b, and c volumes.	24. DS1 25. ISDN 26. 27. DS1 28. DS1 29. DS1 30. DS3 31. ILEC Trunks 32. ILEC Trunks 33. Retail POTS 34. Retail POTS 35. Retail POTS 36. Retail POTS 37. Retail POTS

Appendix 2 Table 1: BellSouth's Proposed Alternative for:

Average Completion Interval (OCI) & Order Completion Interval Distribution

Disaggregation	Analog / Benchmark
Resale Residence	Retail Residence
Resale Business	Retail Business
Resale Design	Retail Design
Resale PBX	Retail PBX
Resale Centrex	Retail Centrex
Resale ISDN	Resale ISDN
LNP	Retail Res.and Bus. (POTS)
2W Analog Loop Design	Retail Res and Bus. Dispatch + 2 days
2W Analog Loop Non-Design	Retail Res and Bus.- POTS (Excl.. Switch-based Orders)
- Dispatch	- Dispatch
- Non-Dispatch (Dispatch In)	- Non-Dispatch (Dispatch In)
UNE Digital Loop < DS1	Retail Digital Service <DS1
UNE Digital Loop =DS1	Retail Digital Service =DS1
UNE Loop + Port Combinations	Retail Res and Bus. (POTS)
- Dispatch Out	- Dispatch Out
- Non-Dispatch	- Non-Dispatch
- Dispatch In	- Dispatch In
- Switch Based	- Switch Based
UNE Switch Ports	Retail Res and Bus. (POTS)
UNE Other Design	Retail Design
UNE Other Non-Design	Retail Res. And Bus. (POTS)
UNE Combo Other	Retail Res., Bus. And Design
- Dispatch	- Dispatch
-Non-Dispatch (Dispatch In)	-Non-Dispatch (Dispatch In)
UNE xDSL (HDSL, ADSL and UCL)	ADSL Provided to Retail
UNE ISDN (Includes UDC)	Retail ISDN – BRI
UNE Line Sharing	ADSL Provided to Retail
Local Transport (Unbundled Interoffice Transport)	Retail DS1/DS3 Interoffice
Local Interconnection Trunks	Parity with Retail

Appendix 3

Customer Trouble Report Rate
Maintenance Average Duration
% Repeat Troubles Within 30 days

Benchmark/Analog

Resale residence
Resale Business
Resale Design
Resale PBX
Resale Centrex
Resale ISDN
LNP (standalone)
2 W Analog Loop Design
2 W Analog Loop Non-Design
UNE Switch Ports
UNE Loop & Port Combo
UNE Combo Other
UNE x DSL (ADSL, HDSL, UCL)
UNE ISDN
UNE Line Sharing
UNE Other Design
UNE Other Non-Design
Local Interconnection Trunks
Local Transport

Parity with retail residence
Parity with retail business
Parity with retail Design
Parity with retail PBX
Parity with retail Centrex
Parity with retail ISDN
Retail POTS
Retail Res. And Bus. Dispatch
Retail Res. And Bus. (POTS)
Retail POTS
Retail Residence and Business
Retail Res., Bus, & Design (Dispatch)
ADSL provided to retail
Retail ISDN-BRI
ADSL provided to retail
Retail Res. & Bus.
Retail Design
Parity with retail
Retail DS1/DS3 interoffice

Appendix 3 Table 1: BellSouth's Proposed Alternative for:

Customer Trouble Report Rate
Maintenance Average Duration
% Repeat Troubles Within 30 days

Disaggregation	Analog / Benchmark
Resale Residence	Retail Residence
Resale Business	Retail Business
Resale Design	Retail Design
Resale PBX	Retail PBX
Resale Centrex	Retail Centrex
Resale ISDN	Resale ISDN
2W Analog Loop Design	Reatil Res., and Bus. Dispatch
2W Analog Loop Non-Design	Retail Res & Bus. (Excl. Switch Based Feature Troubles)
UNE Digital Loop < DS1	Retail Digital Service < DS1
UNE Digital Loop =DS1	Retail Digital Service = DS1
UNE Loop + Port Combinations	Retail res. And Bus.
UNE Switch Ports	Retail Res. And Bus. (POTS)
UNE Other Design	Retail Design
UNE Other Non-Design	Retail Residence and Business
UNE Combo Other	Retail Res., Bus., and Design Dispatch
UNE xDSL (HDSL, ADSL and UCL)	ADSL Provided to Retail
UNE ISDN (Includes UDC)	Retail ISDN – BRI
UNE Line Sharing	ADSL Provided to Retail
Local Transport (Unbundled Interoffice Transport)	Retail DS1/DS3 Interoffice
Local Interconnection Trunks	Parity with Retail

Company BELLSOUTH TELECOMMUNICATIONS, INC.

Date August 20, 2001

Matrix III

Enforcement Mechanisms adopted in the TRA Order of February 23, 2001 in Docket 99-00430 ^{/2}	Agree¹ or Disagree² with Baseline Enforcement Mechanism	If disagree, proposed alternative³
Tier 1 - Ordering	See Note 1 and 2 below	See Appendix 4, Attachment 1
Tier 1 - Provisioning	See Note 1 and 2 below	See Appendix 4, Attachment 1
Tier 1 - UNE Provisioning	See Note 1 and 2 below	See Appendix 4, Attachment 1
Tier 1 - Maintenance and Repair	See Note 1 and 2 below	See Appendix 4, Attachment 1
Tier 1 - UNE Maintenance and Repair	See Note 1 and 2 below	See Appendix 4, Attachment 1
Tier 1 - LNP	See Note 1 and 2 below	See Appendix 4, Attachment 1
Tier 1 - IC Trunks	See Note 1 and 2 below	See Appendix 4, Attachment 1
Tier 1 - Collocation	See Note 1 and 2 below	See Appendix 4, Attachment 1
Tier 2 - OSS Pre-Ordering	See Note 1 and 2 below	See Appendix 4, Attachment 2
Tier 2 - Ordering	See Note 1 and 2 below	See Appendix 4, Attachment 2
Tier 2 - Provisioning	See Note 1 and 2 below	See Appendix 4, Attachment 2
Tier 2 - UNE Provisioning	See Note 1 and 2 below	See Appendix 4, Attachment 2
Tier 2 Maintenance and Repair	See Note 1 and 2 below	See Appendix 4, Attachment 2
Tier 2 - UNE Maintenance and Repair	See Note 1 and 2 below	See Appendix 4, Attachment 2
Tier 2 - Billing	See Note 1 and 2 below	See Appendix 4, Attachment 2
Tier 2 - LNP	See Note 1 and 2 below	See Appendix 4, Attachment 2
Tier 2 - IC Trunks	See Note 1 and 2 below	See Appendix 4, Attachment 2
Tier 2 - Collocation	See Note 1 and 2 below	See Appendix 4, Attachment 2

¹ With regards to the Enforcement Mechanism, BellSouth agrees with the truncated z statistical testing methodology, with the two-tiered penalty structure, with the enforcement cap of 36% after interLATA authority is granted to BellSouth and with the per transaction penalty calculation.

² With regard to all Enforcement Mechanisms, BellSouth disagrees the enforcement plan should apply to all measurements, disagrees with the fee structure, and disagrees with the value of parameter delta as set at 0.25.

^{/2} See Appendix 4 for a listing of adopted enforcement measures.

³ See Appendix 4, Attachment 1 and 2 for a listing of the alternative Tier 1 and Tier 2 sub-metrics proposed as enforcement measures.

<u>Applicable to all Measurements on Matrix I</u>¹						
TABLE-1: LIQUIDATED DAMAGES TABLE FOR TIER-1 MEASURES						
PER AFFECTED ITEM						
	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6
Pre-Ordering	\$2500 \$20	\$5000 \$30	\$7500 \$40	\$10,000 \$50	\$12,500 \$60	\$15,000 \$70
Ordering	\$2500 \$40	\$2500 \$50	\$7500 \$60	\$10,000 \$70	\$12,500 \$80	\$12,500 \$90
Provisioning	\$2500 \$100	\$2500 \$125	\$7500 \$175	\$10,000 \$250	\$12,500 \$325	\$12,500 \$500
Provisioning UNE (Coordinated Customer Conversions)	\$2500 \$400	\$2500 \$450	\$7500 \$500	\$10,000 \$550	\$12,500 \$650	\$12,500 \$800
Maintenance and Repair	\$2500 \$100	\$2500 \$125	\$7500 \$175	\$10,000 \$250	\$12,500 \$325	\$12,500 \$500
Maintenance and Repair UNE	\$2500 \$400	\$2500 \$450	\$7500 \$500	\$10,000 \$550	\$12,500 \$650	\$12,500 \$800
LNP	\$2500 \$150	\$2500 \$250	\$7500 \$500	\$10,000 \$600	\$12,500 \$700	\$12,500 \$800
Billing	\$2500 \$1.00	\$2500 \$1.00	\$7500 \$1.00	\$10,000 \$1.00	\$12,500 \$1.00	\$12,500 \$1.00
IC Trunks	\$2500 \$100	\$2500 \$125	\$7500 \$175	\$10,000 \$250	\$12,500 \$325	\$12,500 \$500
Collocation	\$2500 \$5,000	\$2500 \$5,000	\$7500 \$5,000	\$10,000 \$5,000	\$12,500 \$5,000	\$12,500 \$5,000

¹Not how BellSouth interprets August 11th, 2001 Order or February 23rd, 2001 Final Order of Arbitration and inconsistent with TRA's decision of July 10, 2001 in the Intermedia arbitration.

TABLE-2: REMEDY PAYMENTS FOR TIER-2 MEASURES

	Per Affected Item
OSS	\$15,000
Pre-Ordering	\$20
Ordering	\$15,000 \$60
Provisionin g	\$15,000 \$300
Provisioning-UNE (Coordinated Customer Conversions)	\$15,000 \$875
Maintenance and Repair	\$15,000 \$300
Maintenance and Repair-UNE	\$15,000 \$875
Billing	\$15,000 \$1.00
LNP	\$15,000 \$500
IC Trunks	\$15,000 \$500
Collocation	\$15,000
Change Management	\$15,000 \$1,000

In summary, Tier 1 enforcement mechanisms payments are paid directly to the CLEC for each of the affected categories listed in the "Liquidated Damages Table for Tier-1 Measures". Tier-2 enforcement mechanism payments are paid directly to the Tennessee Regulatory Authority for each of the affected categories listed in the "Voluntary Payments for Tier-2 measures. Tier-2 payments are paid upon three (3) consecutive months of failure by BellSouth and are in addition to the Tier-1 payments

Enforcement Mechanism penalties are capped at 20% of Net Revenue from Local Exchange Service until BellSouth receives 271 approval and then they are capped at 36% of Net Revenue from Local Exchange Service. ARMIS data issued to determine these caps.

SEEM TIER-1 SUB-METRICS¹

A. ORDERING

1. Firm Order Confirmation and Reject Response Completeness – Fully Mechanized

B. PROVISIONING

2. Percent Missed Installation Appointments – Resale POTS
3. Percent Missed Installation Appointments – Resale Design
4. % Provisioning Troubles within 30 days of Service Order Completion – Resale POTS
5. % Provisioning Troubles within 30 days of Service Order Completion – Resale Design
6. Average Completion Interval – Resale POTS
7. Average Completion Interval – Resale Design

C. UNE PROVISIONING

8. Percent Missed Installation Appointments – UNE Loop and Port Combinations
9. Percent Missed Installation Appointments – UNE Loops
10. Percent Missed Installation Appointments – UNE xDSL
11. Percent Missed Installation Appointments – UNE Line Sharing
12. Average Completion Interval – UNE Loop and Port Combinations
13. Average Completion Interval – UNE Loops
14. Average Completion Interval – UNE xDSL
15. Average Completion Interval – UNE Line Sharing
16. Coordinated Customer Conversions Interval – Unbundled Loops
17. Coordinated Customer Conversions – Hot Cut Timeliness % within interval - UNE Loops
18. Coordinated Customer Conversions – % Provisioning Troubles Received within 7 days of a completed service order – UNE Loops
19. % Provisioning Troubles within 30 days of Service Order Completion – UNE Loop and Port Combinations
20. % Provisioning Troubles within 30 days of Service Order Completion – UNE Loops
21. % Provisioning Troubles within 30 days of Service Order Completion – UNE xDSL
22. % Provisioning Troubles within 30 days of Service Order Completion – UNE Line Sharing

¹ List from Exhibit DAC-2 resorted to conform to Matrix III

SEEM TIER-1 SUB-METRICS
CONTINUED

D. MAINTENANCE & REPAIR

- 23. Missed Repair Appointments – Resale POTS
- 24. Missed Repair Appointments – Resale Design
- 25. Customer Trouble Report Rate – Resale POTS
- 26. Customer Trouble Report Rate – Resale Design
- 27. Maintenance Average Duration – Resale POTS
- 28. Maintenance Average Duration – Resale Design
- 29. % Repeat Troubles within 30 days – Resale POTS
- 30. % Repeat Troubles within 30 days – Resale Design

E. UNE MAINTENANCE & REPAIR

- 31. Missed Repair Appointments – UNE Loop and Port Combinations
- 32. Missed Repair Appointments – UNE Loops
- 33. Missed Repair Appointments – UNE xDSL
- 34. Missed Repair Appointments – UNE Line Sharing
- 35. Customer Trouble Report Rate – UNE Loop and Port Combinations
- 36. Customer Trouble Report Rate – UNE Loops
- 37. Customer Trouble Report Rate – UNE xDSL
- 38. Customer Trouble Report Rate – UNE Line Sharing
- 39. Maintenance Average Duration – UNE Loop and Port Combinations
- 40. Maintenance Average Duration – UNE Loops
- 41. Maintenance Average Duration – UNE xDSL
- 42. Maintenance Average Duration – UNE Line Sharing
- 43. % Repeat Troubles within 30 days – UNE Loop and Port Combinations
- 44. % Repeat Troubles within 30 days – UNE Loops
- 45. % Repeat Troubles within 30 days – UNE xDSL
- 46. % Repeat Troubles within 30 days – UNE Line Sharing

F. LNP

- 47. LNP – Percent Missed Installation Appointments
- 48. LNP – Average Time Out of Service for LNP Conversions

F. IC TRUNKS

- 49. Trunk Group Performance – CLEC Trunk Group
- 50. Percent Missed Installation Appointments – Local IC Trunks
- 51. % Provisioning Troubles within 30 days of Service Order Completion – Local IC Trunks
- 52. Average Completion Interval – Local IC Trunks
- 53. Missed Repair Appointments – Local IC Trunks
- 54. Customer Trouble Report Rate – Local IC Trunks
- 55. Maintenance Average Duration – Local IC Trunks
- 56. % Repeat Troubles within 30 days – Local IC Trunks

SEEM TIER-1 SUB-METRICS
CONTINUED

G. COLLOCATION

57. Collocation Percent of Due Dates Missed

SEEM TIER-2 SUB-METRICS ¹

A. OSS PRE-ORDERING

1. Average Response Time – Pre-Ordering/Ordering
2. Interface Availability – Pre-Ordering/Ordering
3. Interface Availability – Maintenance & Repair
4. Loop Makeup – Response Time – Manual
5. Loop Makeup – Response Time – Electronic

B. ORDERING

6. Acknowledgement Message Timeliness – EDI
7. Acknowledgement Message Timeliness – TAG
8. Acknowledgement Message Completeness EDI
9. Acknowledgement Message Completeness TAG
10. Percent Flow-through Service Requests (Summary)
11. Reject Interval
12. Firm Order Confirmation Timeliness
13. Firm Order Confirmation and Reject Response Completeness – Fully Mechanized

C. PROVISIONING

14. Percent Missed Installation Appointments – Resale POTS
15. Percent Missed Installation Appointments – Resale Design
16. Average Completion Interval – Resale POTS
17. Average Completion Interval – Resale Design
18. % Provisioning Troubles within 30 days of Service Order Completion – Resale POTS
19. % Provisioning Troubles within 30 days of Service Order Completion – Resale Design

D. UNE PROVISIONING

20. Percent Missed Installation Appointments – UNE Loop and Port Combinations
21. Percent Missed Installation Appointments – UNE Loops
22. Percent Missed Installation Appointments – UNE xDSL
23. Percent Missed Installation Appointments – UNE Line Sharing
24. Average Completion Interval – UNE Loop and Port Combinations
25. Average Completion Interval – UNE Loops
26. Average Completion Interval – UNE xDSL
27. Average Completion Interval – UNE Line Sharing
28. Coordinated Customer Conversions Interval – Unbundled Loops
29. Coordinated Customer Conversions – Hot Cut Timeliness % within interval - UNE Loops
30. Coordinated Customer Conversions – % Provisioning Troubles Received within 7 days of a completed service order – UNE Loops

¹ List from Exhibit DAC-2 resorted to conform to Matrix III

SEEM TIER-2 SUB-METRICS
CONTINUED

- 31. Cooperative Acceptance Testing - % xDSL Loops Tested
- 32. % Provisioning Troubles within 30 days of Service Order Completion – UNE Loop and Port Combinations
- 33. % Provisioning Troubles within 30 days of Service Order Completion – UNE Loops
- 34. % Provisioning Troubles within 30 days of Service Order Completion – UNE xDSL
- 35. % Provisioning Troubles within 30 days of Service Order Completion – UNE Line Sharing

E. MAINTENANCE & REPAIR

- 36. Missed Repair Appointments – Resale POTS
- 37. Missed Repair Appointments – Resale Design
- 38. Customer Trouble Report Rate – Resale POTS
- 39. Customer Trouble Report Rate – Resale Design
- 40. Maintenance Average Duration – Resale POTS
- 41. Maintenance Average Duration – Resale Design
- 42. % Repeat Troubles within 30 days – Resale POTS
- 43. % Repeat Troubles within 30 days – Resale Design

F. UNE MAINTENANCE & REPAIR

- 44. Missed Repair Appointments – UNE Loop and Port Combinations
- 45. Missed Repair Appointments – UNE Loops
- 46. Missed Repair Appointments – UNE xDSL
- 47. Missed Repair Appointments – UNE Line Sharing
- 48. Customer Trouble Report Rate – UNE Loop and Port Combinations
- 49. Customer Trouble Report Rate – UNE Loops
- 50. Customer Trouble Report Rate – UNE xDSL
- 51. Customer Trouble Report Rate – UNE Line Sharing
- 52. Maintenance Average Duration – UNE Loop and Port Combinations
- 53. Maintenance Average Duration – UNE Loops
- 54. Maintenance Average Duration – UNE xDSL
- 55. Maintenance Average Duration – UNE Line Sharing
- 56. % Repeat Troubles within 30 days – UNE Loop and Port Combinations
- 57. % Repeat Troubles within 30 days – UNE Loops
- 58. % Repeat Troubles within 30 days – UNE xDSL
- 59. % Repeat Troubles within 30 days – UNE Line Sharing

SEEM TIER-2 SUB-METRICS

CONTINUED

G. BILLING

- 60. Invoice Accuracy
- 61. Mean Time to Deliver Invoices
- 62. Usage Data Delivery Accuracy

H. LNP

- 63. LNP – Average Time Out of Service for LNP Conversions
- 64. LNP – Percent Missed Installation Appointments

I. IC TRUNKS

- 65. Trunk Group Performance – Aggregate
- 66. Percent Missed Installation Appointments – Local IC Trunks
- 67. Average Completion Interval – Local IC Trunks
- 68. % Provisioning Troubles within 30 days of Service Order Completion – Local IC Trunks
- 69. Missed Repair Appointments – Local IC Trunks
- 70. Customer Trouble Report Rate – Local IC Trunks
- 71. Maintenance Average Duration – Local IC Trunks
- 72. % Repeat Troubles within 30 days – Local IC Trunks

J. COLLOCATION

- 73. Collocation Percent of Due Dates Missed

K. CHANGE MANAGEMENT

- 74. Timeliness of Change Management Notices
- 75. Timeliness of Documents Associated with Change